



# Mendocino County Farm Bureau

Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

Attn: Paul Dabbs  
Strategic Water Planning  
Statewide Integrated Water Management  
California Department of Water Resources  
PO Box 942836, Sacramento, CA 94236-0001

Re: Public Comment on the North Coast Hydrologic Region of the California Water Plan

Dear Mr. Dabbs,

The Mendocino County Farm Bureau (MCFB) wishes to submit comment on the North Coast Hydrologic Region of the California Water Plan, specifically on the Eel and Russian River watershed management areas.

## **Page 2-3 under the Eel River Watershed Management Area**

The Black Butte River should be added as a main tributary to the Eel River water shed as it converges with the Middle Fork of the Eel River along the boundary of the Mendocino National Forest in the Covelo area. Twenty-one miles of the Black Butte were listed as wild and scenic in October of 2006.

## **Page 2-4 under the Russian River Hydrologic Unit**

There is no mention of Lake Mendocino in this paragraph in relation to water storage of the East Fork of the Russian River. This is a major component of the Russian River hydrologic unit.

## **Page 2-5 under Climate**

*The coastal mountain ranges of Northern California are said to have an annual runoff of 29 million acre feet, constituting 41% of the state's total runoff. It is also mentioned that this is the largest runoff volume compared to all other hydrologic regions in California.*

MCFB is concerned that statements such as this will lead to further exploitation of Northern California water sources to support Southern California interests.

**Page 2-6 under Demographics**

*The population of the North Coast region was about 640,000 in 2000, which is less than 2% of California's total population.*

Again, this statement can be seen as supporting the export of Northern California water to areas in California with larger urban populations.

**Page 2-7 under Land Use Patterns**

*Round Mountain Reservation should read Round Valley Reservation.*

*However, in recent years the timber industry has declined as a result of over-cutting timber, economic issues and environmental regulations.*

MCFB would like to add some additional talking points in regards to the decline of the timber industry in Northern California. First and foremost, very little timber is being cut, especially in Mendocino County. There is no longer a viable lumber mill infrastructure to support the existing stands of timber and those mills that are still in existence are running at historically low capacity. Without an outlet to market and produce timber products, very little of the existing timber supply can be managed. Second, due to the extreme economic situation within the State of California and the United States as a whole, the housing market has drastically declined leading to a correlated downturn in the production of timber products. Lastly, foreign competition through the importation of wood products needs to be considered.

**Page 2-8 within second paragraph**

When discussing irrigation water use (81% for the region) it would be beneficial to mention the value of the crops in relation to the related industries and the support of the local economy. Many North Coast counties have historically been commodity driven with a resource based economy. Water used for irrigation and frost control is a beneficial use of water, and the economic figures support this.

## **Page 2-9 under Environmental Water**

MCFB appreciates the discussion about illegal water diversions especially in relation to the marijuana growing epidemic. These diversions truly affect the environmental quality of the watershed, but currently there is no working solution to control these illegal water uses. In Mendocino County, we are entering into a third year of drought and water issues are a primary concern. MCFB would encourage the DWR and SWRCB to become actively involved with efforts and methodology to eradicate illegal water diversions.

The Black Butte River should be added to the list of rivers affected by illegal diversions as there are a large number of illegal marijuana grows along this water shed.

*Forest roads are a major contributor of sediment, especially fine sediment to streams. In order to manage their effect, roads near streams are often rocked, which is better than native surface roads but not as good as the more expensive paved, chip sealed, etc.*

The word “forest” is not an accurate description of the sedimentation run off issues that are being described and should be changed to “un-surfaced roads”.

While there is significant sedimentation to streams due to un-surfaced roads, the vast majority has been shown to be associated with residential roads and the inference here is that it is somehow connected to forest management is wrong. The problem with stream sedimentation is not limited to forest roads, but to all un-surfaced road systems that are used year round especially those systems that are involved with residences.

An additional consideration is the vast number of un-surfaced roads, especially those on government owned property (USFS, BLM, and State Parks) or those under county jurisdiction that have fallen into a state of disrepair. There is little or no funding available to these government agencies to properly maintain the miles of un-surfaced roads that are under their jurisdiction. Also, the federal funding provided through the Secure Rural Schools and Road Act which was initiated to support loss of timber sales on National Forests has also taken a large hit over the past five years, which in turn has affected county road maintenance on the North Coast. When funding does become available, the road maintenance is often assigned to the lowest bidder. The old adage, you get what you pay for, is very relevant since water turn- outs are often not pulled and the roads are not properly graded. This leads to culvert blow outs, pot holes, overall degradation of the road surface and increased run off. At the same time, large areas of land within the National Forests in Northern California have been declared Wilderness Areas over the last decade which legally prevents road maintenance and encourages natural road erosion in order to return the land to a state of wilderness. With reduced maintenance and a

continued use, the un-surfaced road systems on government owned lands within the North Coast counties will continue to degrade and add to the sedimentation of the watershed.

MCFB encourages the DWR, SWRCB, NMFS and DFG to hold federal and state owned un-surfaced roads to the same standard and scrutiny as privately maintained roads.

*Much of the North Coast rock is poor quality and breaks into fine particles quickly, further reducing the effectiveness and the duration of efficacy for rocking.*

Within Mendocino County there are numerous high-quality rock sources that make ideal road surface material. Continual protests filed by local residents located near rock sources or environmental interests have all but stopped the use of a number of these quarries. Now, rock used both for private and county road surfaces are often hauled from surrounding counties. This is not very efficient considering hauling costs, increased transit time and use of fossil fuels.

*There are negative effects due to water drafting. In order to abate dust (which helps with subsequent erosion from road surfaces), water is drafted from streams. Late in the summer and early autumn, the flow of many streams is depleted to such an extent that there are significant concerns about direct and cumulative effects on habitat of salmonid and other aquatic organisms.*

Water drafting is stringently regulated by both the State Water Quality Control Board and the Department of Fish and Game. The comment above may very well be accurate for illegal drafting; if that is the intent then it should be clearly stated. Again, the majority of illegal diversion is seen through the large number of “straws” that are put into the rivers and tributaries to irrigate marijuana gardens.

## **Page 2-10 under Water Management Objectives**

**Objective 5:** An environmental justice issue is a vague term that does not have a clear relationship to disadvantaged communities. What determines either an environmental justice issue or a disadvantaged community? This objective is covered in the previous four objectives and MCFB recommends this objective to be deleted.

## Page 2-11

Typo in third paragraph: currently reads, capture and regulate water **form** Dry and Warm Springs Creek  
Should be **from**.

*Upstream on the Russian River, an intra-basin water transfer system known as the Potter Valley Project (PVP) has been in existence since 1908. The PVP diverts water from the upper reaches of the Eel River at Cape Horn Dam through a tunnel to the East Fork Russian River upstream from Lake Mendocino. The PVP is owned and operated by Pacific Gas and Electric and produces electricity for the city of Ukiah.*

*The water stored behind Coyote Dam (Lake Mendocino, built in 1958) is used to meet instream flow requirements and urban and agricultural uses in the lower Russian River watershed and the Santa Rosa area. Mendocino County authorities would like to see Coyote Dam raised to increase water storage in Lake Mendocino; however, there are many concerns that millions could be spent to study the project and the project would not materialize.*

Since Mendocino County, in the upper Russian River watershed, benefits from the water released from Lake Mendocino the following change needs to be made:

**Lower** Russian River watershed, should read either **Upper and Lower** or just **Russian River watershed**.

Mendocino County authorities and water users would like to see Coyote Dam raised to increase water storage in Lake Mendocino. To date, there has been a tremendous amount of time and money put into developing the Feasibility Study component of this project. Since all of the local water agencies are being asked to cost share with the USACE, this process seems endless, but not hopeless.

Mendocino County is currently facing a third year of drought conditions and the water level in Lake Mendocino is approximately at half of the possible storage capacity. Without the Emergency Change Petition that was submitted to the SWRCB in April by the Russian River Flood Control and Water Conservation Improvement District as well as the Sonoma County Water Agency, Lake Mendocino would be dry by late summer. The “May Miracle” rains that

we experienced were a much needed blessing, but not enough to overcome the overall water shortage. The Change Petition will reduce the outflows from Lake Mendocino to the West Fork of the Russian River and will allow entire communities such as Redwood Valley to have a water supply for the remainder of the year. Saying this, mandatory water rationing is in effect and there is an overall community awareness of the water situation.

One critical issue in this entire system is the interlinking of two separate watersheds, the Eel River and the Russian River. Often it is seen that the Eel River is at normal flow levels based on the influence of the snow melt when the Russian River is at stages seen during dry or critically dry years. Unfortunately, as seen this year, running the two independent systems on one standard can be detrimental. If the normal year outflows from Lake Mendocino had not been petitioned to be reduced, then water would be leaving the reservoir faster than it was coming in. This defeats the water storage principle.

During low storage years in Lake Mendocino it would be beneficial to be able to bypass high peak flows in the Eel River (from storms or snow melt) through the Potter Valley Project. This idea has been proposed and seems logical, however due to the numerous controlling and environmental interests involved with the Potter Valley Project, the Eel River, Lake Mendocino and the Russian River, this process rarely occurs.

With the numerous road blocks in the system and the inability to further intertwine the two rivers, raising Coyote Dam is an option that needs higher priority. If the dam was raised, then during years of normal rain fall more water could be stored to rollover incase of drought conditions the following year. MCFB supports the raising of coyote dam.

## **Page 2-12**

*Water quality problems include contamination of surface water due to nonpoint source pollution from storm water runoff, erosion and sedimentation (roads, agriculture, and timber harvest), channel modification, gravel mining, dairies, and MTBE, PCE, and dioxin contamination.*

Here again it is implied that agriculture and timber harvesting are ranked with roads as erosion and sedimentation problems. There have been many studies done that clearly indicate that poorly maintained roads are by far the most significant sources of erosion and stream sedimentation and this needs revision.

## Page 2-13

*Historically, there is a lack of framework for integration of state priorities with local planning efforts. While cumulative impacts are felt at the regional or even statewide scale, many of these impacts tend to be caused at the local level, and are most affected by local planning. It is therefore critical that the transfer of data and priorities between State and local planning efforts take place in an organized fashion. Scale issues may also be problematic. State agencies are addressing broad statewide issues and priorities, while local planning is high resolution and focused at the county, city, or watershed scale.*

MCFB supports an improvement in the communication between State and local agencies in developing uniform water related regulations and policy.

## Page 2-22

*Together with wildfires, extensive timber harvesting and heavy precipitation primarily in the form of rain, the watershed is highly susceptible to erosion and landslides.*

This statement does not take into account the natural geology of the North Coast and the predisposition to land slide activity. Within a majority of Mendocino County there is a bedrock layer of Franciscan Formation. Franciscan Formation rocks are prone to weathering and development of thick top soil layers. The combination of heavy clay soils and Franciscan rocks often lead to highly unstable areas that are subject to movement, even without heavy precipitation. The natural geology component should be added to the list of landslide causes.

*The North Coast Region's basin plan sets turbidity restrictions to control erosion impacts from logging and related activities, such as road building. Timber harvests can also decrease the canopy shading rivers and streams, thereby increasing water temperatures to levels that are detrimental to cold water fisheries.*

The above comments may have had some merit in the late 1970's but anyone following the transition in the forest management practices and regulations would know that logging practices and road building standards have greatly improved in the interim. In addition there is significantly less forest management going on. The comment regarding shade canopy along fish bearing streams is ludicrous, stream temperature and shade requirements have been closely studied and heavily regulated to the point that this is no longer a consideration and needs to be removed from this planning document.

**Page 2-23**

*Abandoned mines, forest herbicide application, and historical discharge of wood treatment chemicals at lumber mills, including Sierra Pacific Industries near Arcata and Trinity River Lumber Company in Weaverville, also are regional issues of concern.*

The statement above is misleading as all the practices above are historical and need to be represented as such.

**Page 2-24**

*When compared to the more developed regions of the state, urban and agricultural water use in the North Coast Hydrologic Region is a relatively small part of the total available water.*

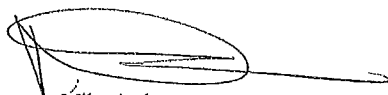
There should be some mention of the current percentage of water in the North Coast Region that is used for environmental purposes. This will demonstrate the “small part” that is being used for urban and agricultural purposes.

**Page 2-25**

*Existing and planned water projects will need to be operated in ways that do not affect the fishery, which might alter methods and schedules for water diversions, hydropower operations and wastewater discharges.*

This statement is intertwined with the previous comment and demonstrates the complexity in North Coast water management. In some instances a regulatory drought has been created as fishery and environmental concerns have become the largest consumer of water in California, including the North Coast. Some middle ground needs to be reached so that both environmental and human water use can be balanced.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Anderson", with a long horizontal line extending to the right.

Mike Anderson  
President, Mendocino County Farm Bureau